

**In the Matter of:**

**Jane Doe**

**v.**

**Barbazette, et. al.**

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**William Woolf**

August 31, 2022

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William Woolf

1  
8/31/2022

1 UNITED STATES DISTRICT COURT  
2 EASTERN DISTRICT OF VIRGINIA  
3 (Alexandria Division)

4 -----:  
JANE DOE, :

5 Plaintiff, :

6 v. :

7 FAIRFAX POLICE OFFICER #1, et al., :

8 Defendants. :  
9 -----:

: Case No.:  
: 1:21-cv-1150

10 Fairfax, Virginia

11 Wednesday, August 31, 2022

12 Videotaped Deposition of:

13  
14 WILLIAM WOOLF,

15 called for examination by counsel on behalf of  
16 defendants, pursuant to Notice, at the County Office  
17 Building, 12000 Government Center Parkway, Suite  
18 549, Fairfax, Virginia, at approximately 10:02 a.m.,  
19 before Christina Patino, a Certified Verbatim  
20 Reporter, and Notary Public in and for the  
21 Commonwealth of Virginia, when were present on  
22 behalf of the respective parties.

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## 1 A P P E A R A N C E S

2 On behalf of Plaintiff:

3 VICTOR M. GLASBERG, ESQUIRE  
4 Victor M. Glasberg & Associates  
5 121 S. Columbus Street  
6 Alexandria, Virginia 22314  
7 (703) 684-11008 On behalf of Defendants Edwin Roessler, James  
9 Baumstark, and Vincent Scianna.:10 KIMBERLY P. BAUCOM, ESQUIRE  
11 12000 Government Center Parkway  
12 Suite 549  
13 Fairfax, Virginia 22035  
14 (703) 324-270415 On behalf of Defendants Jason Mardocco and Mike  
16 Barbazette.:17 HEATHER K. BARDOT, ESQUIRE  
18 McGavin, Boyce, Bardot, Thorsen & Katz, PC.  
19 9990 Fairfax Boulevard  
20 Suite 400  
21 Fairfax, Virginia 22030  
22 (703) 385-1000

On behalf of William Woolf:

STEPHEN COCHRAN, ESQUIRE  
Roeder, Cochran, Phillips, PLLC  
8280 Greensboro Drive  
Suite 550  
McLean, Virginia 22102  
(703) 749-6050

ALSO PRESENT: Bill Casamo, Videographer

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1 police department?

2 A That's correct.

3 Q Were the circumstances or, I guess, did  
4 the information that you received include  
5 information that Barbazette had been placed on  
6 administrative leave?

7 A I don't recall if that was -- I mean,  
8 possibly.

9 Q During those conversations did you also  
10 hear information or discuss Jason Mardocco?

11 A I wasn't -- I wasn't familiar with  
12 Mr. Mardocco. It may have been mentioned that  
13 there was another individual involved, but to the  
14 best of my recollection, I did not work alongside  
15 Mr. Mardocco during my employment with the police  
16 department.

17 Q When did you leave the police department?  
18 When did you resign?

19 A The -- September 30th, 2017.

20 Q Prior to you calling Mr. Glasberg to let  
21 him know that you had knowledge about the case, had  
22 you ever met him before?

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1 Q All right. So let me rephrase the  
2 question. All of the people who became defendants  
3 in this lawsuit were people whose names you  
4 provided to Mr. Glasberg, correct?

5 A Yes, I did provide those names.

6 Q All right. And with regard to  
7 Barbazette, who I'll talk with you about later.  
8 Put him aside for a minute. My other client,  
9 Mardocco, what prompted you to provide his name to  
10 Mr. Glasberg?

11 MR. GLASBERG: Object to the form of the  
12 question, but go -- go ahead and answer if you can.

13 THE WITNESS: I -- I don't believe I  
14 provided that name.

15 BY MS. BARDOT:

16 Q Okay. So that is not a name that you  
17 suggested or spoke about with Mr. Glasberg?

18 A No, ma'am.

19

20

21

22

Is that accurate?

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1 A Correct, I have no direct knowledge.

2 Q Okay. And did you even know Mardocco

3 when you worked at the department?

4 A I -- I don't recall him from my time at

5 the --

6 Q Okay.

7 A -- police department.

8 Q All right. So to the extent that you  
9 have provided information that's contained within  
10 the second amended complaint, your information does  
11 not pertain to Mr. Mardocco?

12 A Correct.

13 Q Okay. And then I'm going to show you  
14 what's been -- what's going to be marked as the  
15 next exhibit.

16 MS. BARDOT: It should be 39.

17 (Woolf Exhibit Number 39 was marked for  
18 identification.)

19 BY MS. BARDOT:

20 Q And I'll represent to you that this is  
21 the first amended complaint that was filed on  
22 December 16, 2021. And if you turn to page six, in

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1 MS. BARDOT: Is it 40?

2 THE WITNESS: 39. Or no. 40. You're  
3 right. I'm sorry.

4 MS. BARDOT: Okay.

5 (Woolf Exhibit Number 40 was marked for  
6 identification.)

7 BY MS. BARDOT:

8 Q Look through this document, if you would,  
9 and when you're done perusing it, let me know.

10 A Yes.

11 Q Do you recognize anything listed on  
12 Exhibit 40 to be a class which you taught at the  
13 Fairfax County Criminal Justice Academy?

14 A Specific to human trafficking?

15 Q Yes.

16 A I -- I -- I'm not sure what these generic  
17 human trafficking ones are. It -- it's very  
18 difficult to tell from this --

19 Q Okay.

20 A -- without context.

21 Q Did Jason Mardocco ever attend any class  
22 that you gave at the Fairfax County Criminal

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1 Justice Academy that touched on the topic of human  
2 sex trafficking?

3 A I do not know.

4 Q How about Barbazette?

5 A He was with me for some of the roll call  
6 trainings and --

7 Q Okay. My question is specific to the  
8 academy.

9 A Oh, to the academy. So he would have  
10 been there during the gang school when I taught  
11 a -- a block on trafficking.

12 Q Okay. When was that?

13 A I would have to look. I don't know. We  
14 taught gang school, I think, twice a year.

15 Q And how do you know he would have been  
16 there?

17 A Because he would routinely come to the  
18 classes.

19 Q Okay. You haven't looked at his training  
20 records to see what he was actually at, have you?

21 A Well, there wouldn't be a training record  
22 for that because as the supervisor of the unit, he



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1 would just come as the supervisor. He wouldn't  
2 register for that course.

3 Q Okay. So you wouldn't be able to say  
4 what courses, if any, he was actually at, correct?

5 A No, I can't.

6 Q And you wouldn't know if he came to one  
7 of those twice-a-year events, whether he stayed for  
8 part of it or all of it, correct?

9 A Correct.

10 Q And so if Mike Barbazette said that he  
11 did not receive training at the Fairfax  
12 caddy (sic) -- Fairfax County Criminal Justice  
13 Academy on human sex trafficking, you wouldn't know  
14 whether that's true or not, correct?

15 A I do recall him being there when I taught  
16 my class and -- as part of the gang school.

17 Q When?

18 A He was not a registered participant.

19 Q Okay. When?

20 A I'd -- I'd have to think on the date. I  
21 have -- I have no idea because we taught it so many  
22 times.

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1           Q     How many times do you recall him being  
2     present at the academy when you gave a talk on  
3     human sex trafficking?

4           A     One.

5           Q     Okay. And with respect to the roll call  
6     trainings, how many times did you give any sort of  
7     roll call training on human sex trafficking?

8           A     I don't have a specific number. It was  
9     quite a bit.

10          Q     All right. That doesn't help me. Can  
11     you give me an estimate?

12          A     So there are -- let's see. There's eight  
13     district stations with six squads per station.  
14     Eight times six, anyone? Sorry.

15               MR. COCHRAN: Forty-eight.

16               THE WITNESS: All right. So I would  
17     get -- I estimate half of those, 24.

18     BY MS. BARDOT:

19          Q     I don't understand what -- what that  
20     means, 24. My question was: How many times did  
21     you give roll call training on --

22          A     Twenty-four.

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1 Q And are you able to tell me whether or  
2 not Jason Mardocco attended any one of those roll  
3 call trainings that you gave where you talked about  
4 human sex trafficking?

5 A I'm not able to tell you that.

6 Q How about Mike Barbazette?

7 A Yes.

8 Q Okay. When?

9 A I -- I couldn't give you a specific time,  
10 but I do recall him being -- excuse me, at -- at  
11 two of the trainings.

12 Q Where were they?

13 A One was in McLean, at the McLean District  
14 Station, and the other one, I believe, was the  
15 Mount Vernon District Station.

16 Q Okay. And do you know whether he  
17 actually sat through and listened to your roll call  
18 trainings on those two occasions?

19 A Yes, ma'am.

20 Q But you can't tell me when?

21 A I can't remember the exact dates, no,  
22 ma'am.

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1           A     They -- they move around, but at the time  
2     it was in Arizona.

3           Q     When did you do that?

4           A     2014, '15, maybe.

5           Q     Would it be fair to say over the course  
6     of time you've had hundreds of hours of training on  
7     human trafficking?

8           A     I -- I don't know that that's fair.

9           Q     Over 100?

10          A     I -- I -- I don't know.

11          Q     Okay. More than 50?

12          A     Possibly.

13          Q     Okay. And as best you know, Mike  
14     Barbazette has had maybe two and a half hours?

15          A     Of formal training, yes, ma'am.

16          Q     Okay. Do you know about any other  
17     training that you believe Mike Barbazette to have  
18     received on human trafficking?

19          A     Other -- other than multiple  
20     conversations that he and I had about my work.

21          Q     Well, that wasn't training, was it?

22          A     No, ma'am.

1 your expert opinions that you're going to offer?

2 A Yes, ma'am.

3 Q All right. And as I understood you  
4 before, in order to draw any expert opinions,  
5 you've not reviewed the case file from the FBI  
6 related to Barbazette or Mardocco, correct?

7 A Correct.

8 Q And in order to provide expert opinion,  
9 you've not reviewed anything related to the Sanchez  
10 criminal file, correct?

11 A Correct.

12 Q And you haven't reviewed really anything  
13 other than some personnel records and the  
14 complaint, correct?

15 A And the -- the images.

16 Q And the images of the plaintiff in this  
17 case and Hazel Sanchez to see if you recognize  
18 them?

19 A Yes, ma'am.

20 Q Okay. That's the extent of what you did?

21 A And the addresses that we spoke about  
22 earlier.

1           Q     Which were addresses where the plaintiff  
2     claims to have been victimized?

3           A     Yes, ma'am.

4           Q     Okay. You haven't even talked to the  
5     plaintiff, right?

6           A     Correct.

7           Q     Okay. And it says here in this first  
8     paragraph, second sentence -- oh, third sentence,  
9     "At the time I resigned my employment" -- from  
10    Fairfax County -- "in order to be able to pursue my  
11    professional goals related to human trafficking  
12    abatement." Do you see that?

13          A     Yes, ma'am.

14          Q     When you resigned, you went to work for  
15    whom?

16          A     MSCI.

17          Q     And what did you do there?

18          A     I was -- my title was vice president of  
19    training, and my role was to develop and deploy  
20    training relative to human trafficking.

21          Q     Okay. And how long did you stay there?

22          A     About a year.

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1 A Yes, ma'am.

2 Q Who trained you that?

3 A That was -- that's standard training  
4 within the human trafficking space. I'm sure it  
5 was part of the Advanced Human Trafficking  
6 Investigator School, as well as some of the other  
7 courses that I've taken.

8 Q Did you teach that particular con- -- did  
9 you teach that particular concept at any of these  
10 roll call trainings?

11 A Yes, ma'am.

12 Q And can you tell me whether you taught  
13 that at all of the roll call trainings?

14 A Yes, ma'am.

15 Q Okay. And so you think the default is if  
16 somebody's in the commercial sex industry, by  
17 default they're trafficked?

18 A I think that it should be viewed  
19 defaultly (sic) until proven otherwise.

20 Q Okay. And in this case you've done  
21 nothing to determine whether Jane Doe was  
22 trafficked or it could be determined otherwise,

1 correct?

2 A Correct.

3 Q And then you go on to say, "There were  
4 indeed few sex workers who were consenting  
5 participants." Do you see that?

6 A What paragraph, ma'am?

7 Q We're still on five.

8 A Okay.

9 Q So it says, "This was the proper default  
10 assumption, given the sordid nature of this  
11 business, the omnipresence of organized gangs and  
12 sex trafficking organizations, and the fact that  
13 there were indeed few sex workers who were  
14 consenting" --

15 A Yes.

16 Q -- "participants."

17 A Thank you.

18 Q Sure. Where do you derive that  
19 conclusion that "there were few sex workers who  
20 were consenting participants"?

21 A I -- I derive that from my knowledge  
22 through investigations and interviewing sex workers



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1 A Yes, ma'am.

2 Q You talked earlier about the addresses  
3 that Mr. Glasberg spoke to you about. Are these  
4 those addresses?

5 A Yes, ma'am.

6 Q All right. And you don't have any  
7 recollection of being at any of those particular  
8 addresses, do you?

9 A Not the exact addresses.

10 Q All right. And with regard to the people  
11 who are listed here, Andrea Fairfax, et cetera, you  
12 don't have any factual information to suggest that  
13 you've ever been in contact with any of these  
14 persons, do you?

15 A That's correct.

16 Q And do you know who Andrea Fairfax is?

17 A I do not.

18 Q Have you ever spoken with Hazel Sanchez?

19 A No, ma'am.

20 Q To your knowledge, have you ever spoken  
21 with any of the people listed here in paragraph  
22 seven?

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1 A Not to my knowledge.

2 Q It says in paragraph eight, "While I was  
3 at the FCPD, a few police personnel, who had been  
4 trained on sex trafficking, nevertheless actively  
5 discouraged me from pursuing any (sic) ongoing  
6 investigation of sex trafficking in Fairfax." Do  
7 you see that?

8 A Yes, ma'am.

9 Q The actively discouraged -- the active  
10 discouragement, is that what we've already talked  
11 about?

12 A Yes, ma'am.

13 Q And when you refer to "a few police  
14 personnel," who are you speaking of?

15 A I believe I go on to say the two officers  
16 I recollect were Sergeant Mike Barbazette and  
17 Captain James Baumstark.

18 Q Okay. And as -- with respect to the  
19 training that you gave to Mike Barbazette or the  
20 training you are aware of that he had received,  
21 we've already talked about that, correct?

22 A Yes, ma'am.

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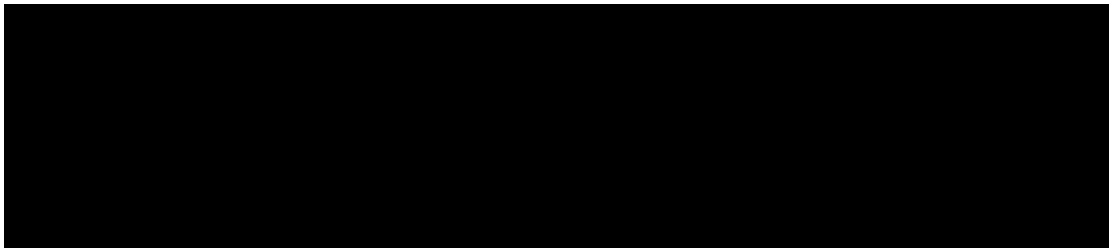



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1 Q And so when you say in paragraph nine  
2 that, "Sergeant Barbazette had been fully trained  
3 on Fairfax's sex trafficking problems," tell me  
4 what you mean by that.

5 A I -- I went on to explain that because  
6 I -- I trained him so that he was in some of those  
7 trainings that we've -- we've already talked about,  
8 and then as I go on to say, "In several private  
9 discussions with him I explained and gave examples  
10 of how our local adult sex workers were almost  
11 entirely trafficked women, largely from  
12 Spanish-speaking or other foreign countries."

13 Q All right. And that in your mind is  
14 fully -- being fully trained on sex trafficking  
15 problems in Fairfax County?

16 A I -- I believe so, yes.

17   
18  Are we  
19   
20  Are we  
21 talking about this one person?

22 A Yes, ma'am.

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1           A     Based on training that -- that I had  
2     provided throughout the police department, as well  
3     as former Chief Rohrer was vocal on the issue as  
4     well.

5           Q     Okay. How many officers were at Fairfax  
6     County when you were there?

7           A     I -- I would be taking a guess, but more  
8     than 1,000.

9           Q     All right. And so when you said most of  
10    those officers had been trained on sex trafficking,  
11    what does that mean?

12          A     That -- that we had trained the majority  
13    in some form or fashion. In some capacity we had  
14    provided training relative to this particular  
15    issue.

16          Q     Right. But I want to know what "most"  
17    means to you in that context, if there are 1,000  
18    officers.

19          A     I -- I don't know.

20          Q     As you sit here today, are you able to  
21    give me any factual information to state how many  
22    officers at Fairfax County had actually been

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1 trained on sex trafficking?

2 A Not specific numbers.

3 Q Okay. And what is the basis for your  
4 comment that, "I find it ludicrous for any trained  
5 FCPD officer not to assume that our local adult sex  
6 workers had been trafficked unless sufficient proof  
7 to the contrary was apparent"?

8 A Because it was in the training itself  
9 that that was not the -- the appropriate approach.

10 Q Anything else?

11 A No. I think that the -- the comments  
12 referencing those that had gone through training.

13 Q Okay. And whether there's "sufficient  
14 proof to the contrary in this case," you don't know  
15 because you haven't looked at any materials, right?

16 A That's correct.

17 Q And whether or not Mike Barbazette knew  
18 of any particular sex trafficking venture in  
19 Fairfax County, you also don't know that, correct?

20 A Can you ask the question again? I'm  
21 sorry.

22 Q Sure. Are you aware whether Mike

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1 of the victims of those or the suspects?

2 A I would have to -- I'd have to think.  
3 Suspects, Michael Mains. You put me on the spot  
4 here with these names. Michael -- what was  
5 Michael's last name? There's another Michael --  
6 was involved in that case. Oh, my goodness. I'm  
7 just drawing a blank on -- on those names.

8 Q Are you ever aware of Mike Barbazette  
9 having any interactions with any persons he knew to  
10 be involved in a sex trafficking venture?

11 A Can you say that one more time?

12 Q Are you aware of Mike Barbazette ever  
13 having any interactions with persons he knew or  
14 should have known to be involved in a sex  
15 venture -- sex trafficking venture?

16 A No direct knowledge.

17 Q Okay. And would the answer be the same  
18 as to Mardocco?

19 A Correct.

20

21

22

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1

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■

Do you see that?

6

A I do.

7

Q You've not looked at that documentation,

8

correct?

9

A Correct.

10

Q And so any information you've been

11

provided would be secondhand?

12

A Yes, ma'am.

13

Q And whether or not that documentation

14

supports what's -- what is stated here, you don't

15

know because you haven't seen it, right?

16

A Correct.

17

Q And you wouldn't know if Barbazette had

18

any contact with Hazel Sanchez when that occurred,

19

correct?

20

A Say that one more time. Sorry.

21

Q If Barbazette had any contact with Hazel

22

Sanchez, you would not know when that occurred,

1 correct?

2 A Correct.

3 Q And you would -- the answer would be the  
4 same for Mardocco, right?

5 A Correct.

6 Q And you don't have any information to  
7 suggest that Sergeant Barbazette knew the plaintiff  
8 in this case, correct?

9 A Correct.

10 Q Or knew that she was allegedly involved  
11 in a sex trafficking ring, correct?

12 A Correct.

13 Q And your answers to those two questions  
14 would be the same for Mardocco, correct?

15 A Correct.

16 Q You go on to say, "I find it hard to  
17 believe that they" -- speaking about Barbazette and  
18 Mardocco -- "did not know the women working for  
19 her" -- Hazel Sanchez -- "had been trafficked."  
20 What's the basis for that statement?

21 A All of what we've talked about up to this  
22 point that, you know, it -- it was discussed,



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1 individuals were trained, the former chief talked  
2 about it openly. And police officers are trained  
3 to look for victimized people, and so it -- it  
4 seems hard for me to believe that somebody would  
5 not look at that situation, know that trafficking  
6 exists in Fairfax County and not try to determine  
7 if they were a victim before assuming they were a  
8 consenting participant.

9 Q All right. But you don't even know if  
10 Barbazette or Mardocco knew that any women worked  
11 for Hazel Sanchez, do you?

12 A I do not know that.

13 Q All right. Give me just a minute.

14 A Yes, ma'am.

15 MS. BARDOT: Let's go off for about five  
16 minutes.

17 THE VIDEOGRAPHER: Going off the record  
18 at 5:09.

19 (Brief recess.)

20 THE VIDEOGRAPHER: Back on the record at  
21 5:15.

22 BY MS. BARDOT:

1 believed that there were other Fairfax County  
2 police officers as opposed to just officers  
3 extorting sex from the trafficking enterprises?

4 A I don't recall if that distinction was  
5 made.

6 Q Okay. When you read this paragraph,  
7 then, did you take note of the fact that it said  
8 that there were victims who have reported multiple  
9 Fairfax County police depart- -- police officers  
10 involved in this activity?

11 A I think I read it in the context that we  
12 just discussed.

13 Q Okay. All right. So as you sit here  
14 today, the only -- you only had one victim give you  
15 one name of a Fairfax County Police Department  
16 officer who allegedly was extorting sex from the  
17 trafficking enterprise, right?

18 A That's correct.

19 Q And that person was not one of the  
20 defendants in this case?

21 A That correct.

22 Q Okay.